UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**CRIMINAL NO.**
	:	
v.	:	**MAGISTRATE NO. 21-MJ-594**
	:	
CARLA KRZYWICKI and JEAN LAVIN,	:	**VIOLATIONS:**
	:	**18 U.S.C. § 1752(a)(1)**
	:	**(Entering and Remaining in a Restricted**
Defendants.	:	**Building)**
	:	**18 U.S.C. § 1752(a)(2)**
	:	**(Disorderly and Disruptive Conduct in a**
	:	**Restricted Building)**
	:	**40 U.S.C. § 5104(e)(2)(D)**
	:	**(Violent Entry and Disorderly Conduct in**
	:	**a Capitol Building)**
	:	**40 U.S.C. § 5104(e)(2)(G)**
	:	**(Parading, Demonstrating, or Picketing in**
	:	**a Capitol Building)**

INFORMATION

The United States Attorney charges that:

COUNT ONE

On or about January 6, 2021, within the District of Columbia, **CARLA KRZYWICKI and JEAN LAVIN** did knowingly enter and remain in a restricted building and grounds, that is, any posted, cordoned-off and otherwise restricted area within the United States Capitol and its grounds, where the Vice President and Vice President-elect were temporarily visiting, without lawful authority to do so.

(**Entering and Remaining in a Restricted Building**, in violation of Title 18, United States Code, Section 1752(a)(1))

COUNT TWO

On or about January 6, 2021, within the District of Columbia, **CARLA KRZYWICKI and JEAN LAVIN** did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engage in disorderly and disruptive conduct in and within such proximity to a restricted building and grounds, that is, any posted, cordoned-off and

otherwise restricted area within the United States Capitol and its grounds where the Vice President and Vice President-elect were temporarily visiting, when and so that such conduct did in fact impede and disrupt the orderly conduct of Government business and official functions.

(**Disorderly and Disruptive Conduct in a Restricted Building**, in violation of Title 18, United States Code, Section 1752(a)(2))

COUNT THREE

On or about January 6, 2021, within the District of Columbia, **CARLA KRZYWICKI and JEAN LAVIN** willfully and knowingly engaged in disorderly and disruptive conduct within the United States Capitol Grounds and in any of the Capitol Buildings with the intent to impede, disrupt and disturb the orderly conduct of a session of Congress and either House of Congress and the orderly conduct in that building of a hearing before or any deliberation of, a committee of Congress and either House of Congress.

(**Violent Entry and Disorderly Conduct in a Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(D))

COUNT FOUR

On or about January 6, 2021, within the District of Columbia, **CARLA KRZYWICKI and JEAN LAVIN** willfully and knowingly paraded, demonstrated, and picketed in any United States Capitol Building.

(**Parading, Demonstrating, or Picketing in a Capitol Building**, in violation of Title 40, United States Code, Section 5104(e)(2)(G))

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
DC Bar No. 415793

By: _____
DOUGLAS G. COLLYER
Assistant United States Attorney (Detailee)
NDNY Bar No. 519096
555 Fourth Street, N.W.
Washington, DC 20530
Phone: (518) 314-7800
E-mail: douglas.collyer@usdoj.gov